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Attorney for Plaintiff,  
Gerardo Hernandez

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

GERARDO HERNANDEZ,

Plaintiff,

VS.

THE SHERWIN-WILLIAMS COMPANY  
dba SHERWIN-WILLIAMS PAINT STORE,  
et al.,

Defendants.

Case No. 3:20-cv-01167-RS

**STIPULATION TO EXTEND DEADLINE  
TO COMPLETE JOINT SITE  
INSPECTION REQUIRED BY GENERAL  
ORDER 56; [PROPOSED] ORDER**

1 Plaintiff, Gerardo Hernandez (“Plaintiff”), and Defendants, The Sherwin-Williams  
2 Company dba Sherwin-Williams Paint Store, and Jill Investments, LLC (“Defendants,” and  
3 together with Plaintiff, “the Parties”), by and through their respective counsel, hereby stipulate  
4 as follows:

5 1. This action arises out of Plaintiff’s claims that Defendants denied him full and  
6 equal access to their public accommodation on account of his disabilities in violation of Title III  
7 of the Americans with Disabilities Act (“ADA”) and parallel California law. Plaintiff seeks  
8 injunctive relief under federal and California law, as well as damages under California law.  
9 This matter therefore proceeds under this district’s General Order 56 which governs ADA  
10 access matters.

11 2. The Court has ordered that the Parties conduct a joint site inspection 60 days  
12 after service of the complaint (General Order 56, as amended in January 2020) of the subject  
13 property, in this instance, on or before April 27, 2020.

14 3. The parties require an extension due to the COVID-19 pandemic and shelter-in-  
15 place order for Alameda County.

16 4. Nonetheless, the Parties have agreed to conduct the joint site inspection on June  
17 12, 2020 at 1:00 p.m. if the matter does not settle prior to that time, subject to the Parties’  
18 reservation to further modify the date if necessary.

19 5. Accordingly, the Parties stipulate to extend the deadline to conduct the joint site  
20 inspection to June 12, 2020, with all dates triggered by that deadline continued accordingly.

21 **IT IS SO STIPULATED.**  
22

23 Dated: March 24, 2020

MOORE LAW FIRM, P.C.

25 /s/ Tanya E. Moore

26 Tanya E. Moore

27 Attorney for Plaintiff,

Gerardo Hernandez

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STIPULATION TO CONTINUE DEADLINE FOR JOINT SITE INSPECTION; [PROPOSED] ORDER

1 Dated: March 24, 2020

CIRRUS LAW PC

2  
3 /s/ Joshua D. Brysk

Joshua D. Brysk

4 Attorneys for Defendants,

5 The Sherwin-Williams Company dba Sherwin-  
6 Williams Paint Store, and Jill Investments, LLC

7 **ATTESTATION**

8 Concurrence in the filing of this document has been obtained from each of the individual(s)  
9 whose electronic signature is attributed above.

10 /s/ Tanya E. Moore

11 Tanya E. Moore

12 Attorney for Plaintiff,

Gerardo Hernandez

13  
14 **[PROPOSED] ORDER**

15 The Parties having so stipulated and good cause appearing,

16 **IT IS HEREBY ORDERED** that the deadline for the Parties to complete the joint site  
17 inspection is extended to June 12, 2020, with all dates triggered by that deadline continued  
18 accordingly.

19 **IT IS SO ORDERED.**

20  
21 Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge